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**COUNSEL FOR DEBTORS  
AND DEBTORS-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>	§	
	§	
<b>SPORTS ONE SUPERSTORES CORP.,</b>	§	<b>Case No. 22-30085</b>
<b>AND</b>	§	
<b>TEXAS HOLDINGS FIRM</b>	§	<b>Chapter 11</b>
<b>CORPORATION,</b>	§	
	§	<b>(Jointly Administered)</b>
<b>Debtors.</b>	§	

**MOTION TO WITHDRAW AS COUNSEL  
FOR DEBTORS-IN-POSSESSION**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 1100 COMMERCE STREET, ROOM 1254, DALLAS, TX 75242-1496, BEFORE CLOSE OF BUSINESS ON MAY 24, 2022, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

TO THE HONORABLE STACEY G. C. JERNIGAN,  
UNITED STATES BANKRUPTCY JUDGE:

Tittle Law Group and attorney Brandon J. Tittle (collectively, “Counsel”) file this *Motion to Withdraw as Counsel for Debtors-in-Possession* (the “Motion”), and hereby moves to withdraw as counsel of record for Debtor Sports One Superstores Corp. (“Sports One”) and Debtor Texas Holdings Firm Corporation (“Texas Holdings,” and collectively with Sports One, the “Debtors”), and respectfully shows the Court as follows:

1. On January 20, 2022 (the “Petition Date”), the Debtors each commenced cases in this Court by filing petitions for relief under Chapter 11 of the Bankruptcy Code.

2. On February 1, 2022, this Court entered an *Order Granting Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of the Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 13] (the “Joint Administration Order”), which ordered that the chapter 11 cases of Sports One and Texas Holdings be jointly administered.

3. From the inception of the two Chapter 11 Cases, the Debtors have been embroiled in a dispute with the Danbury Partners, Ltd. (“Danbury”)—the landlord of a premises which Texas Holdings leased for Sports One to operate its business in. Counsel has diligently represented the Debtors’ interests during these bankruptcy proceedings—both with respect to the ordinary management of the chapter 11 cases and by litigating numerous motions involving the dispute with Danbury.

4. Counsel’s final representation of the Debtors’ interests occurred on May 2, 2022, at a five-hour hearing on the *Debtors’ Motion for Entry of an Order Imposing Civil Contempt Sanctions Pursuant to Sections 105 and 362 of the Bankruptcy Code* [Docket No. 37] and the *Motion of Danbury Partners, Ltd. to Compel to Enforce Settlement Agreement* [Docket No. 53].

5. At the conclusion of such hearing, Mr. Enoch Kirkwood—the President and CEO of the Debtors—became displeased with Counsel’s advice regarding how the Debtors should handle the Court’s ruling at the hearing. Mr. Kirkwood demanded that Counsel no longer contact him and cease representation of the Debtors.

6. Counsel’s relationship with the Debtors’ representative has therefore deteriorated to the point that continuing in an attorney-client relationship with the Debtors would be impossible.

7. Other than the requirement that the Debtors each prepare and file Monthly Operating Reports by the 20th day of each month, Counsel is unaware of any other impending deadlines.

8. Counsel has made every effort to inform the Debtors’ representatives of the Debtors’ responsibilities in these bankruptcy cases and the requirement that the Debtors—as entities—be represented by counsel. Counsel is unaware of any succeeding attorney retained by the Debtors. In compliance with Rule 2091-1 of the Local Bankruptcy Rule of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), the contact information for the Debtors’ representative known to Counsel is as follows:

Sports One Superstores Corp.  
Texas Holdings Firm Corporation  
c/o Enoch Kirkwood, President and CEO  
8111 Lyndon B. Johnson Fwy.  
Dallas, TX 75027  
Phone: 678-412-1319  
Emails: [enoch@SportsOneSuperstores.com](mailto:enoch@SportsOneSuperstores.com); [management@cmaholdingsllc.com](mailto:management@cmaholdingsllc.com);  
[texasholdingsfirm@gmail.com](mailto:texasholdingsfirm@gmail.com).

9. As of the time of this filing, the representative of the Debtors has not responded to diligent attempts of Counsel to confer regarding this Motion and obtain his signature evidencing approval of Counsel’s withdrawal.

10. For the reasons stated above, withdrawal of counsel is authorized by Rule 2091-1 of the Local Rules.

11. Counsel will follow this Motion with a First and Final Fee Application for the services provided to the Debtors during these bankruptcy proceedings.

Dated: May 3, 2022.

Respectfully submitted,

/s/ Brandon J. Tittle

Brandon J. Tittle

Texas Bar No. 24090436

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**WITHDRAWING COUNSEL FOR DEBTORS  
AND DEBTORS-IN-POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2022, a true and correct copy of the foregoing was served electronically on all parties receiving notice via the Court's ECF filing system, via first-class mail on all parties listed on the attached Master Service List, and on the Debtors' representative via email.

/s/ Brandon J. Tittle  
Brandon J. Tittle

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have attempted to confer with the Debtors' representative to receive consent to this Motion. As of the time of this filing, the Debtors' representative has not responded. I further certify that I have fully informed the Debtors' representative of all upcoming deadlines and have advised the Debtor to obtain new counsel as soon as possible.

/s/ Brandon J. Tittle  
Brandon J. Tittle

AT&T Inc.  
Attn: Legal  
208 S. Akard St,  
Dallas, TX, 75202

Canon Financial Services, Inc.  
Attn: Legal  
158 Gaither Drive, Suite 200  
Mount Laurel, NJ 08054

Edward Dowd  
3455 Peachtree Rd. NE Ste 500  
Atlanta, GA 30326

Dallas County Tax Office  
500 Elm Street, Suite 3300  
Dallas, Texas 75202

Internal Revenue Office  
Centralized Insolvency Operation  
Post Office Box 7346  
Philadelphia, PA 19101-7346

Danbury Partners, Ltd.  
510 Hearn St, Ste. 200  
Austin, TX 78703

MBC & Associates, LLC  
Attn: Brian Fox  
8334 Sterling Street  
Irving, TX 75063

Danbury Partners, Ltd.  
c/o Howard J. Klatsky, Esq.  
Fee, Smith, Sharp & Vitullo LLP  
13155 Noel Road, Suite 1000  
Dallas, TX 75240

Reliant  
Attn: Legal  
1000 Main St  
Houston, TX 77002

Danbury Partners, Ltd.  
c/o Robert Nicoud  
Nicoud Law  
10440 N. Central Expressway, Suite 800  
Dallas, Texas 75231

Spectrum  
Attn: Legal  
400 Atlantic St  
Stamford, CT 06901

LL&B Resources, Inc.  
510 Hearn St, Ste. 200  
Austin, TX 78703

Stanley Security  
Attn: Legal  
8350 Sunlight Drive  
Fishers, Indiana 46037

U.S. Small Business Administration  
Office of General Counsel  
409 3rd Street SW  
Washington, DC 20416

Tarrant County Tax Assessor  
100 E. Weatherford Street  
Fort Worth, TX 76196

Office of the United States Trustee  
Earle Cabell Federal Building  
1100 Commerce Street, Room 976  
Dallas, TX 75242